

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff)	Case No. 08 CR 00044
)	
)	Magistrate Judge Mason
v.)	
)	
JERRY SPANN,)	
)	
Defendant)	

**EMERGENCY MOTION FOR MODIFICATION
OF CONDITIONS OF RELEASE TO PERMIT TRAVEL**

JERRY SPANN, through his counsel, KEVIN P. BOLGER, respectfully requests this Court to issue an order granting JERRY SPANN permission to travel to HIGHLAND, INDIANA for purposes of attending a family vacation with his minor children.

1. JERRY SPANN was arrested and charged with Conspiracy to Distribute Cocaine. He was released on a O/R Bond.
2. JERRY SPANN participates on a men's soft ball team which is scheduled to play in a championship series from August 8 to August 12, 2008 in Highland, Indiana.
3. AUSA TYLER MURRY has stated that he has no position on this request. Pretrial Service has no opposition to the request.

Wherefore for the foregoing reasons, it is respectfully requested that the defendant's motion be granted and an order issue permitting JERRY SPANN to travel to Highland, Indiana.

Respectfully submitted,

By: s/ Kevin P. Bolger

KEVIN P. BOLGER
150 NORTH WACKER DRIVE-2460
CHICAGO, ILLINOIS 60606
312 899 8100

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff)	Case No. 08 CR 00044
)	
v.)	Magistrate Judge Mason
)	
JERRY SPANN,)	
)	
Defendant)	

ORDER

And now, this _____ day of _____, 2008, it is hereby,

ORDERED, that JERRY SPANN's conditions, entered in the above-captioned case, are hereby modified granting his permission to travel outside of the Chicago metropolitan area to vacation with his children in Highland, Indiana from August 8, 2008 to August 12, 2008.

UNITED STATES JUDGE

Copies to:

Assistant U.S. Attorney

Counsel for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff)	Case No. 08 CR 00044
)	
)	Magistrate Judge Mason
v.)	
)	
JERRY SPANN,)	
)	
Defendant)	

NOTICE OF FILING

TO: CLERK OF THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS 219 S. DEARBORN STREET, 20 TH FLOOR CHICAGO, IL 60604	OFFICE OF THE U.S. ATTORNEY NORTHERN DISTRICT OF ILLINOIS AUSA TYLER MURRAY 219 S. DEARBORN, 5 TH FLOOR CHICAGO, IL 60604
---	--

PLEASE TAKE NOTICE that on the 29th day of JULY, 2008 I shall file with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, the attached **EMERGENCY MOTION FOR MODIFICATION OF CONDITIONS OF RELEASE TO PERMIT TRAVEL**, a copy of which is hereby served upon you.

PROOF OF SERVICE

The undersigned, being duly sworn on oath, deposes and states that he served via e-filing a copy of the aforementioned document on the parties to whom said notice is directed on the **29th** day of **July, 2008**.

Respectfully submitted,
By: s/ Kevin P. Bolger

KEVIN P. BOLGER
150 NORTH WACKER DRIVE-2460
CHICAGO, ILLINOIS 60606
312 899 8100